


doing this, the icon should appear at least at the start of the show and then again after each commercial break.

These issues about the new television ratings system should not be taken lightly. There have been countless studies conducted that attempt to find what kind of an impact television has on young children. One such study was done by Dr. Leonard D. Eron where he set out to find what caused aggression in children. His conclusions were quite interesting.

The best predictor of aggression among boys, now in their late teens, had nothing to do with how their parents treated them; it was the amount of television violence they had watched a decade earlier (Kolbert, 1994, A1)

This study shows just how important this issue is. There is no doubt that television has a strong and lasting impact on children. It is wonderful to see that real action is finally being taken to help children grow up with the television in the best and most positively influential way, but there are steps that must be taken to ensure that these good intentions see good results.

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CS 97-55

RECEIVED

APR 22 1997

Federal Communications Commission
Office of Secretary

IN THE MATTER OF: The new television rating system

COMMENTS OF: Megan Coneys

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COMMENTS:

During my youth, parental guidance for television programming did not really exist. My mother had rules, but none of them ever applied to the types of shows and movies I watched because she never knew that much about them herself. She raised three children as a single parent and she never had much time to pre-screen shows for child appropriateness. Therefore program restrictions were never an issue in my home. Although for years I believed that this did not affect me in a negative way, I have recently discovered otherwise. Thanks to a course I am taking at Tufts University titled "Children and the Media", I have noticed how some of my fears about crime derive from my freedom to view violence and horror on t.v. during my youth. It is for this reason that I write this evaluation to you. The new television rating system is a step in the right direction but I feel more can be done to help parents evaluate programming for their child, especially with regard to violence. The new ratings provide parents with a lot more information, but some of it proves to be extremely deceiving.

Violence exists in shows for all ages, from cartoons to

adult late night movies. However, although violence is a problem in young children's shows, I see the violence in programs during the prime time hours as the most detrimental to young minds. When I was about nine or ten years of age, I watched television consistently up until about 11:00 at night. I had thought that I was one of the few children who watched television that late. But as studies show, 10.1 million children, ages two to eleven, are still active viewers between 8:00 and 11:00pm. (McGill, 1994, 98) Knowing these statistics, I do not understand why the network Fox airs a show such as "Millennium" at 9:00 on Friday nights, and why it is only a TV14 rating. I happened to see the premiere episode of "Millennium" a few months ago. and I found it to be honestly the scariest television show I have ever seen. It has potential to compete with such horror content as in "Friday the 13th" and "Halloween." One scene in that episode shows a victimized man trying to scream but his eyes and mouth are sewn shut restricting his voice and vision. I can still picture this image in my head and for a few days afterwards I could not get rid of it. The description of a TV14 rating warns parents to be "strongly cautioned" and not let their "children under the age of 14 watch unattended." (Biddle, 12/30/96,) But should children that age be watching this show even with their parents? The advisories can be deceiving. If a parent had sat down with their child to preview the first episode with them, I cannot help but believe that many parents would be sorry they had exposed their children to that type of horror.

This deception brings me to the problem of consistency in ratings during prime time hours. This past week I viewed "Melrose Place" (Fox, 8pm Monday 2/17/97). The rating for this particular episode was TV14. The show immediately following "Melrose Place" was a special program titled "When Animals Attack III" (Fox, 9pm Monday 2/17/97). The rating from the episode of "Melrose Place" to this special dropped from TV14 to PG, signifying to parents that this show is more suitable for young viewers between the ages of about ten to fourteen years of age to watch than "Melrose Place." Yet "Melrose Place" showed an unsuccessful mugging by a man with a knife, while "When Animal Attacks III" glorified animals violently attacking human beings, and in one instance the camera showed a person covered in his own blood. I believe that unintellectual soap-opera type trash such as "Melrose Place" is more suitable for young viewers than hostile, vicious animals attacking people.

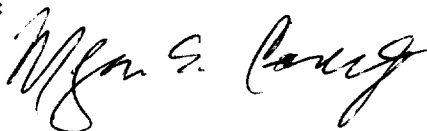
The host, Robert Urich, did come on at the beginning of the show to announce viewer discretion because there was "graphic violence" throughout the show. Yet according to the PG rating description, only "limited violence" is mentioned. (Biddle, 12/31/96) The phrase "graphic violence" is used only to describe the rating TVM for mature audiences only. (Biddle, 12/31/96) Thus why did the network not use the TVM rating? A parent may have consented to letting her child view the program based on the PG rating, unaware of the graphic violence contained in the program. In the TV Guide

listing for the week of February 15-21, 1997, the rating PG is there, but not the viewer discretion warning about the show's graphic violence; a huge deception for parents following the new rating system. In a report about the television rating system, it states that "for children, a program's 'scariness' is a factor that should be incorporated into the rating system, perhaps in the violence category." (Children Now, 1996) Although the word "scariness" does not really exist, it is an actual issue that exists and must be addressed. The report goes on to discuss the rating discrepancy in the movie "Jurassic Park." Although the MPAA movie-rating was PG, the film contained many frightening scenes for young viewers. I recall letting out a small yelp when seeing the movie for the first time. One professor addresses this discrepancy stating, "scientific evidence makes it very clear that the kinds of depictions in that film pose some problems for very young children." He then makes a comparison to television and wisely advises, "A TV rating should not make that same mistake."

As long as television exists, its critics will always exist. It is impossible to satisfy every viewer. Thus I write this letter not as a criticism but as a suggestion to avoid some criticism and protect children from viewing unnecessary violence on television. Arguments exist over which type of parent really needs this television rating system the most. I cannot prove which parent is in most need, but based on my own experience in a single parent

family, the new ratings system should be a welcomed improvement. Perhaps if my mother had had a ratings system to prohibit my viewing of extreme violence, I would not still be so fearful of being home alone. In addition, I support the idea of a V-chip as well. Although at first I believed the idea of a V-chip to be a little too extravagant for the common American household, I now feel that perhaps it can be of great use to those parents who need to control what their children watch when they are not at home. If the Federal Communications Commission revises the ratings system so it is less deceptive to parents, and begins to implement the V-chip program, then parents can be less fearful of exposing their children to too much violence on television.

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IN THE MATTER OF: The new television ratings system

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APR 22 1997

Federal Communications Commission
Office of Secretary

COMMENTS:

While the new V-Chip television ratings may theoretically be a step in the right direction, in practice they form a system with many flaws. It is a noble idea to attempt to help parents monitor what their children watch, yet the ratings immediately target those parents who already take pro-active roles in their children's television viewing habits. Unfortunately for these parents, though, the ratings are not as easily understood as they need to be for mass consumption. The age-centered grades are inflexible and are not sufficiently explained; there is too much of a difference from network to network. The display of these ratings on individual programs is much too brief and infrequent. With some thoughtful adjustments to the current design, however, a rating system that uses the current structure as a base could both support parents and benefit children developmentally.

The new V-Chip ratings serve primarily to benefit children whose parents already monitor the programs that they watch on television. These parents are most likely aware of the language in *Roseanne* and the sexual content of *Friends*. The graphic *ER* would probably be off-limits to children of these parents. Placing an age-centered rating upon these shows would unlikely be of any help. In order to better assist these parents with their responsibility of regulating TV viewing, ratings need to provide clear, content-based information about programs. In current practice, though, these ratings vary from one network to the next, are not displayed long enough, are inflexibly based on ages, and are not explained as sufficiently as they need to be. Addressing these issues is the first step in building upon the system that was set in place this past January.

While the rating may seem simple enough upon first glance, the television industry has offered little explanation as to what differentiates one rating from another. To explain the TV-14 rating as "Parents strongly cautioned: programs may contain some material that many parents would find unsuitable for children under 14 years of age" provides no concrete reasons why a certain program received this rating (Kunkel, January 31, 1997). Dale Kunkel writes, "It's a bit like offering a weather forecast that says: 'Warning: severe weather approaching,' without telling you whether to expect rain, snow, wind, or fog. The details aren't important: just be careful out there" (Kunkel, 1997). A content-based rating would suggest these "details" by explaining what elements: sex, language, and violence, were present in the program.

If this content information were provided, it would stand in recognition of individual parental values and concerns. Children Now writes, "One parent may find adult language especially offensive, another may only want to protect their child from violence, and yet another may be especially concerned about sexual content" (Children Now, 1996). Under the current system, a program with one or more of these components would most likely be given a TV-14 rating without any further explanation.

Not only are there differences from one parent to the next, but children do not develop at one universal rate. The age-oriented ratings, though, have no room for these important discrepancies. A program that is too mature for one fourteen-year-old, for example, might be okay for another. A parent, not a television network, understands what his/her child can comprehend in an age-appropriate way. Proponents of a content-based rating system suggest that shows be reviewed, rather than strictly rated, based on certain categories (Children Now, 1996).

The fact that networks rate their own programs is immediately signalled as a flaw. It is

very confusing to parents and viewers alike that similar programs get different ratings. CBS gives *The Late Show with David Letterman* a TV-PG rating while NBC's *Tonight with Jay Leno* is TV-14. (Biddle, January 16, 1997, p.N6). NBC's daytime dramas display TV-14 ratings, while ABC's often-racier soaps rarely are labelled as TV-14. Each network obviously has self-interest in mind while rating its programs. NBC, for example, does not want to have parents discourage younger viewers from watching *Friends* if they put a TV-14 label on it. It is unbelievable that this self-absorption is condoned both by the Telecommunications Act of 1996 and by the Federal Communications Commission, because it blatantly stands in direct opposition to the goals of the rating system.

Rather than taking a stand and perhaps losing a sponsor or two, the networks seem to just rate everything as TV-PG, with a few exceptions. What use is a rating scale when the majority of the programs receive the same grade? Dale Kunkel cites the TV-PG rating as ranging from "an incident of rape on *New York Undercover* to the double-entendres on *Seinfeld*" (Kunkel, January 31, 1997). Frederic Biddle writes of an episode of *Law & Order*, also rated TV-PG in which "two skimpily clad hookers approached cops in a car in the show's opening scene" (Biddle, January 3, 1997, p.D7).

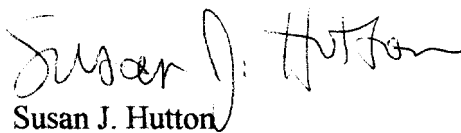
Is this criticism of the ratings system really important when the rating itself is only displayed on the screen for ten to fifteen seconds at the outset of the program? These brief moments are perhaps the most noticeable failing of the new system. If a parent were to take heed of a given grade, for example, and were to change the channel as a result, by then it would be too late to see the next program's rating! Frederic Biddle compares the "quick flash of a tiny ratings icon" to the display of "broadcast identification icons," the former appearing once at the very beginning of the program, the latter reappearing after each commercial break (Biddle,

January 3, 1997, p.D1). It would be much easier if these ratings icons were repeated in the same way that these broadcast ID icons are.

Daniel Anderson writes, "For children, television is a window to the world. Parents should control, limit, and regulate television exactly as much as they control, limit and regulate other things the child does - like taking lessons, like eating, like being outside" (Wulf, June 26, 1995, p.68). In order to help parents to supervise their children as best they can, the television ratings systems needs to be bettered. There is a good deal of room under the current set-up for this improvement.

It is necessary to mention that any discussion of the ratings system overlooks the children whose parents, for whatever reason, do not offer their input about such programs. For these children, the ratings, if anything, will encourage less age-appropriate TV viewing habits (Kunkel, January 31, 1997). While it is not fair to neglect these children, they are affected by an entirely different issue: the amount of age-appropriate and education programming that is on television during hours when children typically are watching. These children will not benefit from any amount of attention given to the ratings. It is up to the television industry to recognize that these children are falling through the cracks and, consequently, to act accordingly.

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IN THE MATTER OF: The new television ratings system

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RECEIVED

APR 22 1997

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Major

COMMENTS: First I will describe the multiple faults that exist with the current age-based rating system and rating system in general. Next I will describe why a content-based rating system is more beneficial to both children and parents (concentrating specifically on labeling violence) and is crucial to an effective ratings system. Last I will propose several suggestions either to improve the current age-based rating system or to do away with it completely and implement a content-based system.

Fundamental (or logistical) faults of the current rating system include short duration of icon appearances, insufficient icon repetition, and lack of icons during promotional commercials. If parents and children cannot see the icons, they are hardly effective. Although some broadcasts do, in fact, show the icons more often than just the opening credits, many still do not. Showing icons only during opening credits means that those viewers who miss the beginning few minutes of a program will not know the rating of the show they are watching.

Faults with an age-based rating system, in general, are numerous and complex. Probably the most basic problem from which all other problems stem, is the fact that program producers are responsible for the ratings (Kunkel, 1/31/97, 794). Someone inside the television industry is controlling the ratings each broadcast receives. How is a program producer supposed to have the background knowledge to deem what is appropriate for children of different ages? Where are the child development experts in all of this? How can one be sure that the TV industry is making the best judgments for children and parents? I would venture to say that the industry has ulterior motives. By virtue of the fact that the industry is commercially, not publicly, run, the members of the industry have a primary purpose to make money. In order to make money, programs need sponsors. And in order to get sponsors, programs need viewers. The industry knows that by putting more stringent ratings on a show, they will lose viewership. Children may not be allowed

to watch and, in turn, their parents may not watch either. It is in the industry's best interest to keep lenient ratings ascribed to their programs so as not to decrease viewership.

In fact, a majority of shows are rated PG--the second mildest of four non-children TV show ratings (Biddle, 1/3/97, D4). This statistic includes most primetime shows that many parents would NOT see as appropriate for their children. And although parental guidance is suggested by this rating, not all parents will, in fact, "guide" their children either by watching the program with them, or telling them they cannot watch. When I think of the rating PG, I think of movies that are rated the same way. And most parents would let their child see a PG movie. But of the programs that are being assigned this rating, many are not appropriate for children. For example, the medical drama *E/R* and the *Late Night with David Letterman* show are both rated PG (Biddle, 1/31/97, N6). I know many parents who would let their seven-year-olds see a PG movie who would not permit them to see these shows. An argument against this is that children do not usually watch primetime television; they watch more after school and on Saturday mornings. However, statistics show that just as many children watch primetime shows Monday through Sunday as watch Saturday morning (McGill, 1994, 98). Children's viewing peaks at seven-thirty to eight o'clock PM on weekdays (McGill, 1994, 99).

A tangential problem of this across-the-board PG rating is that when the V-chips are placed in television sets, determining whether or not to screen out PG shows means either screening out virtually everything, or letting everything through (Biddle, 1/31/97, N7).

Another issue with allowing individual program producers to attribute ratings to shows, is that there is inconsistency. An example of this are the late-night shows. While *David Letterman* is rated PG, *Jay Leno* is rated PG 14 (Biddle, 1/3/97, D4). I see these shows as being virtually identical in terms of which children they would be appropriate for. And there is also inconsistency from episode to episode. While a program may be given a PG for many weeks in a row, a single episode that may have more mature content will receive a higher rating of PG 14 (Biddle, 1/31/97, N7). This is very misleading for parents. While they may think that they are "in the clear" with a

particular series (and therefore let their children watch this single episode), they really should not have permitted their child to watch it, but the damage will already have been done.

And probably the most detrimental shortcoming of the current system, is the fact that producers are judging what is appropriate for ALL children of a certain age group (Kunkel, 1/31/97, 795). The age-based ratings tell a parent what is appropriate for their child rather than offering a choice for them (Children Now, 1996, 4). Parental values are diverse and sometimes incompatible with what producers see as suitable for their children. For example, what a producer sees as fit for all twelve-year-olds may be alright for some but not for others. Only the parents who know the child well can determine if it is appropriate for *their* child. Parents may not know why a show received a certain rating and may assume that it is okay for their child. However, it is possible that if they had more information about why the show received the rating it did, they would not want their child to have access to it.

The only way to provide parents with the information necessary for this decision, is a content-based ratings system. I will begin this section with why it is important to denote specifically violence. While it is also important to indicate sexual content and adult language, there is researched evidence as to why violence should be denoted. I provide some of that evidence here to demonstrate the necessity of this distinction.

Violence has been shown to cause short-term changes in aggressive behaviors, attitudes, and values of those who view it, especially those who view it in excess (Berry and Asamen, 1993, 13). It can also cause children to be less sympathetic to others' pain and suffering, more afraid of the world and their environment, and more willing to use aggression as a means with other children (Berry and Asamen, 1993, 14). Primary needs of children include developing a sense of trust, developing a sense of self-efficacy and competence, and forming a sense of morality and social responsibility (Levin and Carlsson-Paige, 1994, 38-41). But commercial television, in many different genres of shows, undermines this sense of safety, teaches that violence and aggression are the way to resolve conflicts, and shows empowerment and efficacy through violence (Levin and Carlsson-Paige, 1994, 38-41). It also does not help to demonstrate morality

or social responsibility but instead shows how “Might equals right” (Levin and Carlsson-Paige, 1994, 38-41). These facts regarding child development and the results of exposure to violence and aggression emphasize, if not prove, why it is necessary to label a show that contains violence accordingly. Parents want to know which shows contain these damaging portrayals so that they can protect their children from these harmful effects. The only way to inform parents is through content-based ratings.

In fact, most parents do want a content-based system. Approximately 80% of parents said that they would prefer content-based ratings (Kunkel, 1/31/97, 795). This is too large a number to ignore. However, the television industry has chosen to ignore this. Not all parents are concerned about their children being exposed to the same types of material. Some parents may only wish to shelter their children from program violence. Other parents may, in addition, not want their children to see any sort of sexual content or hear any adult language. A content-based system would give parents a way to deal with their specific concerns and values and tailor television viewing to that material which is consistent with their feelings and/or the needs of their child. A system of this type would not, in any way, limit the availability of programming but would provide more information about various programs; information that many parents desire to have (Children Now, 1996, 2). Rating a program based on sexual content, adult language, and violence should not only take into account the amount of each of these three components that exists in the show, but also how each is treated (Children Now, 1996, 6). The rating should be based on degree of graphicness of violence or sexual content, how the perpetrator of violence is treated (Is he/she a hero? Is the violence rewarded? etc.), and whether or not the content is an integral or central part to the story (Children Now, 1996, 6). An argument that television producers may have against this system is that the amount of weekly broadcasts will prevent them from doing this extent of analysis of programs (Kunkel, 1/31/97, 795). But aren't the producers supposed to be doing these analyses for the age-based rating already? Does this mean that they are not doing in-depth analyses necessary to assign appropriate age ratings? The analyses are not different, only the mode of reporting the information.

Maybe there needs to be someone to make sure the producers are doing these analyses. This is just one of many suggestions I have in order to improve the current system. I think that if the age-based system will not be changed to include content, many modifications need to be made. First and foremost, if the ratings are going to be left up to the industry, someone needs to oversee that all decisions are made in the best interest of children and their parents. Whether or not this is the FCC or an impartial committee does not matter, but someone needs to do it. I also think that the age definitions need to be more defined. Children Now proposes four or five categories under age 17 based on developmental needs--preschool, early elementary, late elementary, early teen, and teen (Children Now, 1996, 5). These are much more descriptive and appropriate and would assure that someone with a knowledge of child development in these areas would make the decision regarding what rating to assign. I also think that ratings should be made according to the ads shown during the program. Many primetime shows in which the actual program may not be harmful to younger children may contain advertisements that could frighten small children (for movies, other shows, PSA's regarding abuse/rape, etc.). My last suggestion for the age-based system is just a logistical one. The rating icons need to be shown every time the program returns from a commercial break if not throughout the entire show. It also needs to be shown during promotional commercials so that parents will be aware of when a show in the future will need to be avoided.

Although these changes will help the existing system, I firmly believe that a content-based system is needed. If there was a content-based system, an easy way to rate would be to have a stringent age rating accompanied with an S (for sexual content), an L (for adult language), and a V (for violence). A star may also want to be added for educational or informational shows. This would not be difficult for most parents to decipher. Any parent who is going to take the time to decipher the age-based system (and monitor a child's viewing accordingly) will also do so for a content-based system. This system is more useful for the many reasons cited above.

In conclusion, the FCC has a social responsibility. By allowing television stations free use of airwaves, the FCC and television industry owe it to the people to provide a comprehensive,

informational rating system. We should all want what is best for the children of this country because they are the ones who will be running it someday. The industry apparently doesn't care about them. The only institution that can, in any way, *make* them care, is the FCC. Television is so unregulated already and there is not enough children's programming so children end up watching shows that are too mature and graphic for them. These ratings are needed to supplement (or replace) the Children's Television Act of 1990 which has basically failed in its responsibility of providing quality programming to children at times when they are available to watch it. The current rating system is a step in the right direction, but it's not enough.

The television industry calls it censorship. But it isn't. It's merely labeling. No one is preventing the networks from airing any material. The ratings simply provide information to parents who want to protect their children from some of television's harmful effects. The only censorship that exists in this situation, is that of parents to children. Parents may censor what their children are allowed to watch, but isn't this their undeniable right as parents? Who is the television industry to say that parents shouldn't have that right?

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OS 97-85
RECEIVED
APR 22 1997
FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

IN THE MATTER OF: The new television ratings system

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COMMENTS:

The new ratings system implemented over the past month on network television provides inadequate information for parents and caretakers. The ratings appear on screen for as little as fifteen seconds, and the age-based numbering offers parents relatively vague information while ignoring the specific content of a show. As a result, the impressionable minds of young children suck violence and profanity from PG rated shows and suffer consequently. Furthermore, the major networks reap many benefits from these misconceived notions as families cease to limit their viewing. Thus, they continue to profit from the business of television as they rate their own shows with unprecedented reign over the impressions they hope to give their viewers.

* * *

A rating system will never be perfect; no one expects it to be. However improvements must be made as parents and caretakers begin to rely on this system to help monitor their children's viewing. In fact, with the ratings system in effect many parents may relax their watch and allow their children to view only TV-PG shows. A show that is TV-PG one week, though, may be TV-14 the next, and parents may neglect to notice the difference. That is to say if parents even catch a glimpse of the rating on screen. The small icon

flashes so quickly that if a parent gets up to put dinner in the oven while their son or daughter surfs through loads of commercials, they will have missed the rating when they return to catch the theme song. Would it really be so difficult to leave the logo on screen throughout the show? Fox network implanted their logo in the bottom right hand of the screen permanently and with little consequence (Biddle, 1/3/97, pg. D7). Placing the rating there, as well, remains a reasonable option.

With ratings in place, though, they still fail to give viewers the information they need and deserve. Major networks revel in the business of making money, and they will proceed at any cost to keep their viewers glued to the television set. It's no accident that these ratings hold vague applications. The less viewers can decipher from a rating, the more likely they are to continue watching the program. As a result, networks gave a PG rating to almost two-thirds of their prime-time dramas, thus adopting a neutral stance for most programs (Biddle, N1). Furthermore, these networks may also manipulate the ratings in a manner that entices children to watch higher rated programs while simultaneously quelling the worries of their parents. For example, NBC's "Tonight Show With Jay Leno" holds a rating of TV-14, while CBS gave "The Late Show With David Letterman" a rating of TV-PG (Biddle, pg. N1). Perhaps, the motive behind NBC's rating hoped to lure its audience toward a program with the implication of more explicit and profane content. Perhaps not. The truth remains, though, that while networks rate their own shows, no viewer can be certain of a program's substance without watching it for themselves. A better option might include a neutral party, one that designates the ratings for every network thereby eliminating any monetary bias. This alternative was successfully executed by the Recreational Software Advisory Council in the rating of video-game

content (Kunkel, 1/31/97). It would certainly be a possibility for the television industry, as well.

More trouble lies in the age-based component of the ratings system. Vague categories of different age groups, like TV-Y,Y7, or 14, overshadow the need for any descriptions of violence, profane language, or nudity. The president of the Center for Media Education, Kathryn Montgomery, explains that the rating system, "[has] been carefully designed not to tell parents whether there is violence in a program" (Biddle, 12/30/96). NBC illustrates this point well by rating "ER," a graphically violent and gory hospital drama, PG, while giving the seedy soap opera "Days of Our Lives" a TV-14 rating (Biddle, 12/30/96). As these networks independently rate their shows, they intentionally neglect the fact that each family unit possesses a unique set of values, morals and expectations. The bloody accidents that wheel into an ER trauma room may terrify some children and educate others. Some parents may permit their children to witness brief nudity but vehemently shield them from programs containing explicit violence.

Content classifications must be added to this new rating system. In several studies by the National Parent Teacher Association and the University of Connecticut's Roper Center for Public Opinion Research, results shows that about 80 per cent of parents desired a content-based system rather than one relying on age differences (Kunkel, 1/31/97). Thus, the simple addition of certain letters like V, for violence, N, for nudity, and AL, for adult language, would assist a parent's decision making process. To take this one step further, adding degrees of content such as an MV, for mild violence, might facilitate a parent's job even more. Kathleen Hall Jamieson, the Dean of the Annenberg School for Communication, agrees on the importance of a content-based system. She explains that, "When we buy a

candy bar we can read the label to check for ingredients which may provoke allergic reaction. We should be able to do the same with television viewing." (Children Now, 1996). Without any form of displaying content, the rating system will fail to address the issues of violence and nudity, and, thus, neglect to aid the growing problems that result in our society.

Degrees of violence on both children's and adult television must be rated if we want to protect the impressionable minds of our children. As they sit in front of the tube for 3 - 4 hours a day, their developing minds act like sponges and quickly soak up any and all stimuli that appear on the screen. They learn from everything; violence is no exception. While parents may assume certain "children's" programs are suitable for their son or daughter, many are more violent than expected. One hour of prime-time television may contain only 5 acts of violence, but Saturday morning television may include 20-25 violent acts per hour (Berry, 1993, pg. 14). As a result, "the average child watching an average amount of television will see about 20,000 murders and 80,000 assaults in his or her formative years." (Berry, 1993, pg. 14). Evidence shows that young children may often be damaged by this consistent exposure to violence. As they begin developing attitudes and morals, some become desensitized to victims, some may acquire more aggressive attitudes, while others adopt fearful dispositions as a result of violence (Kunkel, 1/31/97). In an effort to reduce these destructive temperaments, ratings need to include some mention of violent content during each program.

The implementation of these suggestions may improve the ratings system and provide parents with an adequate knowledge of the TV their children are watching. The system, however will inevitably fail to limit what children watch. Networks will always strive to make a buck, and to do so

they must entice viewers with trashy programs. They will always "[concentrate] on how they can benefit from children, instead of how *they* can benefit children" (Charren, 1994 pg. 17). Children will also always remain far more resourceful than parents imagine. If their parents prohibit certain shows, they will watch them at a friend's house. If parents install a V-chip, the child will most likely be the one to learn to program the shows. Many children stay home alone after school and watch what they want, while others program the VCR to tape certain shows at certain time. In any case, it seems more important to concentrate on producing quality programs of educational content, rather than rate those that slaughter a few extra humans to boost their audience.

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IN THE MATTER OF: The new television ratings system

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COMMENTS: As graphic displays of violence, sex, and adult language have become increasingly prevalent on television in recent years, it appears that a TV ratings system is long since overdue. Nearly every American home has at least one television set (most have more), allowing children frequent and easy access to a world of cartoons, game-shows, soap-operas, talk-shows, and a host of other "must see" network programs. Yet, before we embrace this new form of regulation, we should examine more closely the reasoning behind these ratings.

Like the standard movie ratings, the new television ratings screen for age rather than content. There are several problems with this approach, the most important being that it fails to let parents know whether the warnings are for language, sex, or violence. Indeed, parents have different opinions on what is and is not suitable for their children to watch. While some may object to the sexy scenes found on daytime dramas, others may only object to the violence seen on many cop series, or the language of late-night talk shows (Children Now, 1996). By the same token, the majority of shows seem to have acquired a TV-PG rating, yet it is impossible to know whether the "parental guidance" is for sex, violence, or language. Indeed, the system seems to be lacking in the actual amount of guidance it is providing for parents.

On the same note, recent studies have found parents to consistently prefer a content-based ratings approach. In particular, a study by the National Parent Teacher Association found 80 per cent of parents to favor ratings categories by content, while a similar study by the University of Connecticut's Roper Center for Public Opinion Research found an almost identical result: 79 per cent of parents preferred to have ratings by content, as opposed to age (Kunkel, 1/31/97). In addition, the national advocacy group, Children Now, found that 17 out of 18 respondents in a survey of leading child advocates and media researchers, "judged the descriptive approach an essential aspect of any useful ratings system" (ibid).

Furthermore, young children might find the content-based approach less interesting, for it has been shown that kids will be more attracted to "parental guidance" warnings than "contains violent content" (ibid). Just as the prospect of seeing a rated-R movie is so appealing to a young child, the age-based TV ratings could produce the unintentional effect of enticing kids to try and sneak behind their parents backs to watch programs deemed for more mature audiences. The hot topic of playground conversation might consist of children bragging about which TV shows they were allowed to watch the night before. Thus, the new TV ratings are likely to cause competition among children , leaving parents confused about whether or not they should allow their children to watch the same TV-PG shows the other kids seem to be watching.

Therefore, another reason for implementing content-descriptive TV ratings is to provide parents with enough information to come to a relatively secure decision about which programs their children should be allowed to watch. If a show contains an initial warning about violence, parents who feel very strongly that their kids should not be exposed to violence on television, are going to screen out the show despite vehement protests from their children, who may insist that they are being unfair because all of their friends are allowed to watch. In this way, content-based television ratings would explicitly tell parents exactly what could be potentially harmful about the television their kids are watching, and hopefully, encourage them to be more involved in their children's TV viewing sessions.

With the television ratings as they are now, it is very easy for parents to overlook the common TV-PG warning and instead, simply restrict their children from watching TV-14 programs, such as Fox's "Melrose Place" and ABC's "General Hospital". However, chances are that these TV-14 rated shows are not going to appeal to young viewers, and if they do, most parents probably have a good idea as to why they may be unsuitable for their children to watch. Hence, it is the plethora of TV-PG programs, such as Fox's "The Simpsons", "Beverly Hills 90210", and "Party of Five", that parents should be concerned with, for these are the shows that children are definitely interested in watching, and will, most likely, try and find a way to see.

Moreover, it appears that the new TV ratings are catering more to the television industry's needs than to the needs of American parents. By delegating TV-PG ratings to the majority of shows on the networks, the ratings commission is, in a sense, "clouding the reasons why a program is rated in a certain way by providing only the vaguest information about what types of violence or sex are shown" (Kunkel, 1/31/97). If all TV shows were screened for violent content, ratings would undoubtedly decline, causing the networks to lose valuable advertising sponsors. In this way, the easily overlooked 15 second flash of the rating provides an illusion of safety for parents without significantly disrupting viewing proportions. Supporting this theory is the fact that networks rate their own programming, unlike movies, which are rated by an independent board comprised of several groups, including parents.

Along those same lines, another flaw in the ratings system lies in the fact that it completely ignores the type of commercials aired during network programs. If we are supposedly so worried about exposing our children to violence and sex on television, should we not also be concerned about the messages they may be receiving through advertising? Children are known to be very easily influenced by commercials, so much so, in fact, that advertisements which feature popular TV characters are prohibited from being aired during the characters' particular TV